

# The Medical Waste Reporter



## Announcements for Wisconsin's Medical Waste Generators

Reporting year 2004

Issued January 2005

### WI Facilities Earn H2E Awards

Three Wisconsin entities earned Hospitals for a Healthy Environment\* Awards in 2004. St. Vincent Hospital, Green Bay, earned the Making Medicine Mercury Free Award, for becoming virtually "mercury free." PharmEcology, Brookfield, and the WDNR earned Champion for Change Awards for leading the way in improving environmental performance in the health care sector, and for providing support to healthcare facilities working toward the goals of H2E.

Any hospital, clinic or nursing home with a medical waste reduction plan easily qualifies for one or more of the H2E awards. For information and application forms, visit [www.h2e-online.org](http://www.h2e-online.org).

**Applications  
for the 2005  
H2E awards  
are due on  
2/15/05**

All current H2E Partners are especially encouraged to apply for awards. The national awards will be given out in April in Chicago.

\*H2E is a collaborative effort of the Am. Hospital Assoc., the US Environmental Protection Agency, Health Care Without Harm, the Am. Nurses Assoc. and many others.

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### New H2E Partners in 2004

Wisconsin now has 32 H2E Partners representing over 100 affiliated facilities. Medical facilities that joined H2E in 2004 include:

- Affinity Health System, Menasha
- All Saints Health Care, Racine
- CHI Good Samaritan Health Center, Merrill
- Covenant Healthcare System, Inc., Milwaukee
- Quad/Med LLC, West Allis
- St. Joseph's Hospital, Chippewa Falls
- St. Nicholas Hospital, Green Bay
- Tomah Memorial Hospital, Tomah
- United Hospital System, Kenosha
- Wisconsin Heart Hospital, Wauwautosa

### WDNR Proposes Changes to Medical Waste Rule, NR 526

The WDNR's Waste Management Program is drafting revisions to the state's medical waste rule. Generators and transporters have recommended many of these changes, such as to clarify how federal department of transportation (USDOT) rules relate to WI rules and to change the term used for trace chemotherapy waste. These revisions are part of a larger rule package intended to help DNR streamline its operations.

We will present the draft rules to the DNR Board in February, to request permission to hold public hearings in April, with final promulgation in the fall. The draft rules will be posted on the DNR website. To receive further updates, you may join the DNR medical waste e-mail list (see below).

#### **DNR Offers E-mail Announcements**

DNR has an e-mail service for those who submit infectious waste annual reports to the DNR. We send 5-8 messages a month about waste reduction and management, the proposed rule changes, awards, training opportunities, etc. To join the list, contact [Barb Derflinger](#) (see p. 2 contact box).

## Mercury → Reduction ← News

### Hg Reduction Rule Update

The rule "NR106.145 Mercury Regulation" became effective in October 2002. This rule provides a "pollution prevention" means of regulating mercury discharges from municipal wastewater treatment plants that do not meet the very stringent Great Lakes discharge limit for mercury of 1.3 nanograms/liter.

Wisconsin wastewater plants are now testing their effluent discharges for mercury, and recent data show that most plants are exceeding this limit. By the end of 2005, these plants will begin planning and implementing local Mercury Pollutant Minimization Programs to reduce Hg discharges into their sanitary sewer systems. WDNR is writing guidance to develop these programs as each community's wastewater permit comes due over the next five years.

**Among those that will need to implement mercury "Best Management Practices" (BMPs) are hospitals and dental offices.** Other clinics may also be affected by this rule.

For hospitals, BMPs are to identify mercury-containing equipment and chemicals and to substitute reasonable cost-effective non-mercury devices and chemicals. These are the same criteria for earning the H2E "Making Medicine Mercury Free" award, and if a hospital has earned the H2E award, it can avoid doing paperwork and expensive effluent monitoring.

#### HOW TO CONTACT DNR STAFF:

##### *Medical waste questions:*

Barb Derflinger, Medical Waste Coordinator  
Phone: (608) 267-3548 Fax: (608) 267-2768  
Email: [medical.waste@dnr.state.wi.us](mailto:medical.waste@dnr.state.wi.us)  
Address: DNR WA/3, PO Box 7921  
Madison, WI 53707-7921

##### *Mercury questions:*

Randy Case, Mercury Reduction Coordinator  
Phone: (608) 267-7639 Fax: (608) 267-9305  
Email: [charles.case@dnr.state.wi.us](mailto:charles.case@dnr.state.wi.us)  
Address: DNR CO/7, PO Box 7921  
Madison, WI 53707-7921

**DNR Web site:** [www.dnr.wi.gov](http://www.dnr.wi.gov)

For dental offices, BMPs are to maximize the amount of mercury captured and recycled, i.e., to follow the [American Dental Association's](#) recommendations and to install a wastewater amalgam separator. Many hospitals and dental offices have already implemented these practices.

Questions on NR 106 or Mercury Pollutant Minimization Programs can be addressed to [Randy Case](#) (see contact box on this page.)

### 2004 and 2005 Mercury Thermometer Collections

Last year, WDNR offered grants to enable health care facilities and communities to collect mercury thermometers. The twenty-four funded collection events netted 4028 mercury thermometers, a total of 280 LB. Fond du Lac County Health Department alone collected 1225 thermometers!



**WDNR has grant money left over and will again offer money for publicity and FREE disposal for thermometers collected from homes and schools.** The publicity grants will be larger than last year and will cover collections held between January 1 and May 15, 2005. Those who received grants last year may apply again. If you can't offer a collection for the public (but think of the good PR!), at least collect thermometers from your employees' homes. To find out more, visit [www.dnr.wi.gov/org/aw/wm/medinf/grant.html](http://www.dnr.wi.gov/org/aw/wm/medinf/grant.html) or contact Kurt Byfield, WDNR at 608-266-8805 ([kurt.byfield@dnr.state.wi.us](mailto:kurt.byfield@dnr.state.wi.us)).

### Hg elimination: what's next?

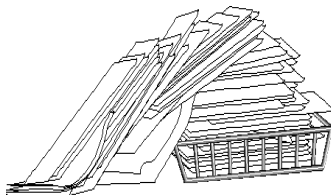
If you have recycled bulk mercury from items such as thermometers, blood pressure cuffs, thermostats and switches, now it's time to look at dissolved mercury, particularly lab reagents. For a list of such reagents by brand name, go to [www.h2e-online.org](http://www.h2e-online.org), click on "Mercury," then "Mercury containing products," then "Mercury-containing laboratory reagents."

Be sure to review the many other mercury-reduction resources on the H2E website. And keep watching for mercury items hidden in your closets.

## Is your facility recycling?

Based on a recent study\*, most Wisconsin residents are recycling at home, but we are not doing a very good job recycling when we're away from home – at special events and in businesses and institutions. Ask yourself:

- Does your workplace recycle **all** the items banned from Wisconsin landfills?
  - ☐ paper (office paper, newspaper, magazines)
  - ☐ steel cans
  - ☐ aluminum cans
  - ☐ glass
  - ☐ plastic (#1 and #2)
  - ☐ cardboard
  - ☐ lead acid batteries
  - ☐ appliances
  - ☐ yard wastes
  - ☐ used motor oil
  - ☐ tires
- Are recycling containers easily accessible both to staff and to clients?
- Are recycling containers clearly marked and placed near regular trash containers so people have an easy choice?
- Are recycling containers emptied often enough?
- Do your cleaning staff keep wastes separate? Does your cleaning contract require that staff be trained, and are they trained?
- Does your purchasing department choose products that reduce waste, contain recycled materials and are easily recyclable?
- Do you avoid and minimize using disposable products when possible?
- Do you recycle hazardous waste, such as cathode ray tubes, lamps, bulbs, hazardous batteries, amalgam, and solvents?
- Have you considered recycling non-corrugated boxboard, non-hazardous batteries, electronic equipment, food waste, other plastics and construction waste?
- Is your waste hauler sharing the profits with you? If not, consider revising your contract. Cardboard, for example, is profitable now.



WDNR is focusing more attention on recycling in businesses and institutions, where recycling of banned materials IS required. WDNR is also proposing revisions to the recycling rules that will clarify what is required of whom.

\*To review the study or for more information, visit [www.dnr.wi.gov/org/aw/wm/recycle/](http://www.dnr.wi.gov/org/aw/wm/recycle/) On the menu on the left, click on "Recycling Studies".

## DOT rules pre-empt DNR rules

DNR learned this year that federal Department of Transportation (USDOT) regulations pre-empt some of DNR's rules about transporting infectious wastes. If you are using a commercial infectious waste transporter, they should be able to tell you what USDOT requires. If not, call USDOT's RSPA Help Line at 1-800-467-4922.

### Some other things you ought to know:

**USDOT may inspect you.** According to one waste hauler, the inspector who handles Wisconsin is "aggressive and thorough." Most of the violations found in medical facilities involve the following:

- untrained persons signing shipping papers,
- lack of training or undocumented training,
- paperwork errors, incomplete shipping papers,
- improper packaging of waste, and
- improper packaging and paperwork for laboratory specimens.

Fines typically run from \$2,000 to 10,000 in hospitals where violations are found.

**USDOT offers basic training.** Basic training modules are \$25 each. Go to [hazmat.dot.gov/](http://hazmat.dot.gov/) Click on "Training Information," and "Hazmat Transportation Training Modules." Your infectious waste hauler or treatment company might also train your staff for free or at low cost.

**USDOT allows the use of pails for packaging lab slides.** USDOT classifies laboratory slides as sharps\*. To pack them, you may use a 5 gallon pail that meets DOT's Packing Group 2 standards, properly labeled. The pails are easy to obtain and less expensive than oversized sharps containers.

\* DNR also classifies lab slides as sharps, but in 2002 we reported that old laboratory slides were not infectious and you could treat them as solid waste (although they may be hazardous waste depending on the reagent used). We were wrong! All lab slides are considered to be infectious waste because DOT rules pre-empt ours.

**USDOT also allows pails for over-packing improper sharps containers.** If you accept sharps from the public, some sharps will arrive in milk cartons, coffee cans or even bags, and if you don't accept them, the person may just leave the sharps in your restroom or outside your door. To handle these improper sharps containers safely, have a pail (described above) at your sharps collection site. Have the individual put the sharps into the pail. Do NOT handle the sharps yourself.

## Why does DNR require infectious waste annual reports?

The simple answer is that state statutes require us to do so. But there are better reasons. DNR uses annual reports to:

- Ensure you examine your waste management practices on a regular basis, so that you can maintain progress and reduce wastes even more.
- Help DNR verify that you and your infectious waste transporters are complying with the recycling and medical waste laws. Through the annual reports, we have detected unlicensed haulers, improper use of manifests, minimal waste reduction programs, etc., which we address with education and enforcement.
- Gather ideas to share with others, such as, “staff education is critical—do it more than annually”. Some articles in this newsletter have been first discovered in annual reports, such as how to deal with drug samples ('01), replacing mercury manometers ('01) and green landscaping ('02).

Since 1995, we have been able to do all of the above on limited resources, and that is a success.

“But what about using the data, not just ideas?” you may ask. Good question. Now that Lindsey Miller, our medical waste data manager since October, has entered most of the backlogged data, we are finally able to do that.



Preliminary graphs of medical waste generation rates (annual report Line K) vs. time show that since 1995, the rates declined for about 5-6 years but now are creeping up again. It's not just from vacutainers, so what is going on? Tell us what you think in your annual report!

Our basic philosophy is to start where you are, get you in the habit of examining your wastes and urge you to keep going by looking at other wastes and environmental issues. Together, we can reduce ALL wastes associated with health care. The annual reports are just one means to that end.

## NEW RESOURCES

There are so many new resources that we can only list a fraction of them in this newsletter. If you want to learn about the latest resources throughout the year, join the **DNR medical waste e-mail list** (see page 1). You should also visit the **Hospitals for a Healthy Environment (H2E)** website frequently at [www.h2e-online.org](http://www.h2e-online.org). H2E flags new items monthly. H2E also offers an e-mail discussion forum and free monthly teleconferences for those purchasing, using or disposing of products and waste from health care.

### Lamp and bulb recycling

Use the most energy efficient bulbs available and recycle all bulbs. See **H2E's** “10 Step Guide to Fluorescent Bulb Recycling” at [www.h2e-online.org/pubs/tensteps/fluor10steps.pdf](http://www.h2e-online.org/pubs/tensteps/fluor10steps.pdf)

The **Association of Lamp and Mercury Recyclers** lists lamp recyclers at [www.almr.org](http://www.almr.org). See also DNR's **Wisconsin Recycling Markets Directory** at [www.dnr.wi.gov/markets/](http://www.dnr.wi.gov/markets/)

### Construction & Demolition

The **Green Guide for Health Care** is a green building best-practices manual created specifically for the health care sector. Go to [www.gghc.org](http://www.gghc.org)

### Donations

Wisconsin's **Sharing Resources Worldwide** can distribute your donations of medical supplies and equipment. [www.dean.org/health\\_ed\\_srw.html](http://www.dean.org/health_ed_srw.html)

**REMEDY** (Recovered Medical Equipment for the Developing World), has a program called "AIRE-mail", the Agencies for International Relief e-mail program. If you have items to donate, you may send an e-mail to [REMEDY@yale.edu](mailto:REMEDY@yale.edu) and they will inform the AIRE-mail members (U.S.-based non-profit organizations) who might need those items. To find out more, go to [www.remedyinc.org](http://www.remedyinc.org)

These announcements were prepared by the Wisconsin Department of Natural Resources, for distribution with publication PUBL-WA-809-04 (infectious waste annual report form packet) in January 2005. Comments and questions can be directed to [Barb Derflinger](mailto:Barb.Derflinger@dnr.wisconsin.gov), DNR Medical Waste Coordinator (see contact box on page 2).